

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DISH NETWORK L.L.C.,

Plaintiff,

v.

HUNG TRAN and THI NGA NGUYEN,
d/b/a Easybox IPTV,

Defendants.

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Civil Action No. 4:19-cv-2994

**Plaintiff DISH Network L.L.C.’s Motion for
Default Judgment Against Hung Tran and Thi Nga Nguyen**

Pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, Plaintiff DISH Network L.L.C. (“DISH”) respectfully moves the Court to grant default judgment against Defendants Hung Tran and Thi Nga Nguyen on Count I of DISH’s First Amended Complaint (Dkt. 12) for direct copyright infringement.¹

DISH’s Motion is based upon the concurrently filed memorandum of points and authorities and supporting declarations of Stephen M. Ferguson with Exhibits 1-27, Gregory Duval with Exhibits 1-6, and Michael Schwimmer with Exhibits 1-2, the pleadings on file in this matter, and any other evidence or argument the Court may consider.

DISH requests that the Court grant default judgment against Defendants, joint and severally, with respect to Count I of the First Amended Complaint for direct copyright infringement, award statutory damages of \$9,900,000, and enter a permanent injunction as set forth in the proposed order to prevent further infringement by Defendants.

¹ The Clerk entered default against Defendants on January 9, 2020. (Dkt. 22.)

Dated: January 30, 2020

Respectfully submitted,

Hagan Noll & Boyle LLC

By: /s/ Stephen M. Ferguson

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